IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE, TENNESSEE

WORD MUSIC, LLC, et al.,	)	
	)	
Plaintiffs,	)	**CASE NO. 3:07-cv-0502**
	)	**JUDGE HAYNES**
v.	)	**JURY DEMAND**
	)	
PRIDDIS MUSIC, INC., et al.	)	
	)	
Defendants.	)	

MOTION TO DISMISS

Come now Defendants Priddis Music, Inc., Richard L. Priddis and Prosound Karaoke, Ltd. (hereinafter the "Priddis Defendants"), by and through undersigned counsel, pursuant to Rule 12(b)(3) of the Federal Rules of Civil Procedure, and pursuant to 28 U.S.C. § 1406(a), hereby move this Court for an Order dismissing the Complaint for improper venue. Further, and in the alternative, pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, the Priddis Defendants move this Court for an Order dismissing the Complaint for lack of personal jurisdiction. In support of this Motion, the Priddis Defendants rely upon a Memorandum of Law and the pleadings filed to date.

Respectfully submitted,

s/ Jeff T. Goodson
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Attorney for the Priddis Defendants

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by electronic means via the Court's ECF system upon the following:

1. Timothy L. Warnock, Bowen, Riley, Warnock & Jacobson, PLC, 1906 West End Avenue, Nashville, TN 37203; and
2. Paul Harrison Stacey, Law Offices of Paul Harrison Stacey, P.C., 7225 N. Spring Gulch Road, P.O. Box 4157, Jackson, WY 83001

and by United States Mail upon the following:

1. Frear Stephen Schmid, 177 Post Street, Suite 890, San Francisco, CA 94108; and
2. Owen Borum, Caplan and Earnest LLC, One Boulder Plaza, 1800 Broadway, Suite 200, Boulder, CO 80302-6737

on this the 1st day of June, 2007.

s/ Jeff T. Goodson
Jeff T. Goodson